

DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

801 K STREET, MS 19-01, SACRAMENTO, CALIFORNIA 95814 (916) 322-4027 • WWW.CALRECYCLE.CA.GOV

June 17, 2010

Chris Cunningham
Palm Springs Disposal Services
P.O. Box 2711
Palm Springs, CA 92263-2711

RE: FINAL AUDIT REPORT – PALM SPRINGS DISPOSAL SERVICES CEWID 102846

Dear Mr. Cunningham:

Enclosed is the final audit report of Palm Springs Disposal Services, regarding the Covered Electronic Waste Recovery and Recycling Program. The audit was planned and performed to determine conformance with the regulations resulting from the Electronic Waste Recycling Act of 2003. The period of review for this audit was January 1, 2008 through December 31, 2008.

The audit disclosed the following findings:

- Missing Certified Weight Tickets
- CalRecycle Form 197 Not Completed Upon Transfer
- CalRecycle Form 198 Not Completed by Collector
- Source-Anonymous CEW Not Logged Separately
- Inaccurate Net Cost Report
- Source Verification Not Established

The response by Palm Springs Disposal Services to the draft audit report on October 14, 2009, along with the evaluation of the response is included in this final report. The response did address your corrective action to the findings.

(Over)

Chris Cunningham June 17, 2010 Page 2

A copy of this letter is being forwarded to the Covered Electronic Waste Recovery and Recycling Program for information and any necessary action, if required.

Please contact Ernesto Espinoza, Associate Management Auditor, at (916) 341-7369 or Ernesto. Espinoza@CalRecycle.ca.gov with any questions regarding this report.

Sincerely,

Súsan R. Villa, Chief Fiscal Services Branch

Administration and Finance Division

Enclosure

cc: Jeff Hunts, Manager, E-Waste Branch, CalRecycle Ernesto Espinoza, Auditor, Audits and Evaluations Unit, CalRecycle CalRecycle Audits and Evaluations Unit File

Palm Springs Disposal Services

Electronic Waste Recovery and Recycling Account

Final Audit Report

Recycler Payment Claim: 1283

For the Period January 1, 2008 Through December 31, 2008

Prepared By: Department of Resources Recycling and Recovery Audits and Evaluations Unit

March 2010

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AJDIT REPORT

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Audit Report Palm Springs Disposal Services (CEWID 102846) Covered Electronic Waste Recovery and Recycling Program

Audit Start Date:

September 21, 2009

Physical Address:

4690 Mesquite Ave.

Palm Springs, CA 92264

Contact Person:

Chris Cunningham

Phone Number:

(760) 327-1351 Ext 303

E-Mail Address:

chris@palmspringsdisposal.com

nakama@1800gotjunk.com

Auditor: Ernesto Espinoza

SUMMARY

The Department of Resources Recycling and Recovery (CalRecycle) processed and paid a claim, in the amount of \$20,680.14, submitted by Amandi Services; an electronic waste recycler. The payments issued by CalRecycle are funded by the Electronic Waste Recovery and Recycling Account.

Audits and Evaluations Unit auditor, Ernesto Espinoza, reviewed records related to the appropriateness of expenditures of Electronic Waste Recovery and Recycling Account, for the period of January 1, 2008 through December 31, 2008.

BACKGROUND

Palm Springs Disposal Services (PSDS) is the only authorized, waste collector and hauler for the City of Palm Springs, California. PSDS provides Residential, Commercial and Roll-Off trash services. They also provide temporary small and large bins for small clean up jobs.

PSDS provides complete Recycling Services for commercial, industrial, construction, and residential customers. They also recycle green waste, electronic waste and document shredding collection services for their customers.

OBJECTIVE, SCOPE, AND METHODOLOGY

The audit was conducted to determine whether Palm Springs Disposal Services complied with CEW reporting, recordkeeping, and payment requirements, as specified by the California Public Resources Code Section 42460, et seq., and the California Code of Regulations (CCR), Title 14, Chapter 8.2.

The audit scope included, but was not limited to, an evaluation of the integrity of electronic waste recycling claims submitted to CalRecycle for payment, and an assessment of operational and regulatory compliance by the recycler.

The audit was conducted in accordance with *Government Auditing Standards*. The standards require that the audit was planned and performed to obtain sufficient and appropriate evidence to provide a reasonable basis for the finding(s), if any, and conclusion based on the audit objective.

CONCLUSION

The following audit findings were identified:

FINDING 1: Missing Certified Weight Tickets

CONDITION:

Palm Springs Disposal Services (PSDS) does not have copies of the Certified Weight ticket, and is not in compliance with Electronic Waste Recovery Regulation 18660.20 (j) (2) (3).

CRITERIA:

Title 14 CCR Section 18660.20 (j) (2) states, "Records of transfers by load to, and recovery payments from, approved recycler, including: (A) Inventory records that document the relationship between the CEWs received from all sources and the CEWs transferred to the approved recycler or to other handlers. (B) Signed and dated receipts showing the number and weight of CEWs transferred. The approved collector shall identify and record each approved recycler using the name and identification number from the recycler's proof of approval."

Title 14 CCR Section 18660.20 (j) (3) states, "Records on the costs, revenues and net costs associated with the collection, transportation and disposition of all CEWs handled as specified in Section 18660.10 of this Chapter."

RECOMMENDATION:

PSDS needs to obtain and retain the Certified Weight Tickets from the recycler.

FINDING 2: CIWMB Form 197 Not Completed Upon Transfer

CONDITION:

Palm Springs Disposal Services (PSDS) is not completing CIWMB 197 form (Covered Electronic Waste Transfer Receipt) but having the recycler complete the form, and is not in compliance with Electronic Waste Recovery Regulation 18660.6 (e) (7) and 18660.20 (h).

CRITERIA:

Title 14 CCR Section 18660.6 (e) (7) states, "An approved collector is entitled for recovery payments only for CEWs transferred to the recycler that are accompanied by applicable source documentation pursuant to Section 18660.20 (h) of this Chapter."

Title 14 CCR Section 18660.20 (h) states, "An approved collector shall provide to any approved collector or approved recycle to whom it transfers CEWs information on the origin (California or Non-California) and cancellation status of CEWs transferred, including but not limited to the following: (1) Signed statement listing the sources(s) of the transferred CEWs as recorded pursuant to subsection (j) of this section. (2) A copy(ies) of the applicable portions of the collection log specified in subsection (j) of this section that describe the collection activities that resulted in the transferred CEWs. (3) Written description of any activity, such as storage, repair, refurbishment, resale, reuse, transfer, packaging and/or consolidation, that explains any discrepancy between the CEWs transferred and the CEWs collected as recorded in a log specified in subsection (j) of this section. (4) A copy of any applicable proof of designation specified in subsection (k) of this section associated with CEWs collected while acting as a designated approved collector for a local government."

RECOMMENDATION:

PSDS needs to complete the CIWMB 197 form (Covered Electronic Waste Transfer Receipt) when transferring CEWs to the recycler.

FINDING 3: CIWMB Form 198 Not Completed By Collector

CONDITION:

Palm Springs Disposal Services (PSDS) is not completing CIWMB 198 form (Covered Electronic Waste Collection Log) but having the recycler complete the form, and is not in compliance with Electronic Waste Recovery Regulation 18660.20 (j).

CRITERIA:

Title 14 CCR Section 18660.20 (j) states, "In addition to the general record keeping requirement in Section 18660.8 of this Chapter, an approved collector shall maintain the following records: (1) A collection Log containing: (A) For each collection activity or event that results in CEWs transferred to the approved collector, a brief written description of the collection activity or event, including the type of California sources targeted for collection, the date and location the activity or event occurred, the number of CEWs collected, and a estimate of the weight of CEWs collected. (B) Approved collectors that are not California local governments, nor entities acting as the designated approved collector for a California local government, shall maintain a list of all California sources who discarded the CEWs transferred to the approved collector, including the name and address of the California source and the number of CEWs discarded by the California source. (C) When receiving five (5) or more CEWs units discarded from a non-residential California source, an approved collector shall record the name of the non-residential organization, an address, a contact person and a telephone number. (D) A list of other handlers and approved collectors who transferred CEWSs to the approved collector in any month, including the name and address of the other handler and approved collector and the number of CEWs transferred and the sources of those CEWs as recorded pursuant to parts (A) and (B) of this section"

RECOMMENDATION:

PSDS needs to complete CIWMB 198 form (Covered Electronic Waste Collection Log) when transferring CEWs to the recycler.

FINDING 4: Source-Anonymous CEW Not Logged Separately

CONDITION:

Palm Springs Disposal Services (PSDS) is not listing Source Anonymous CEWs on form CIWMB 198 SA (Source Anonymous Collection Log) but listing the CEWs Source Anonymous on form CIIWMB 198 (Covered Electronic Waste Collection Log), and is not in compliance with Electronic Waste Recovery Regulation 18660.20 (j) (1) (E)

CRITERIA:

Title 14 CCR Section 18660.20 (j) (1) (E) states, "When collecting source-anonymous CEWs, all approved collectors shall: (1) Log the source-anonymous CEWs collection activity separately. (2) Provide a brief written description of the activity or incident that resulted in the source-anonymous CEWs. (3) Record the date and location of the activity or incident, the number and an estimate of the weight of source-anonymous CEWs collected from the location of the activity or incident. (4) Record the name, organizational affiliation, address and phone number of a person responsible for the site of the activity or incident."

RECOMMENDATION:

PSDS needs to log Source Anonymous CEWs separately from Non-Source Anonymous CEWs.

FINDING 5: Inaccurate Net Cost Report

CONDITION:

The auditor reviewed the Net Cost Report and found multiple errors on the report. The report was completed incorrectly and CalRecycle cannot rely on the data submitted. Palm Springs Disposal (PSDS) is not in compliance with the Electronic Waste Recovery Regulation 18660.10 (b) (d) governing the administration of the Electronic Waste Recovery and Recycling Act.

CRITERIA:

Title 14 CCR Section 18660.10 (b) states, "An approved collector or an approved recycler shall maintain records and provide information for use to CalRecycle in the update on their actual net costs to operate."

Title 14 CCR Section 18660.10 (D) states, "An approved collector and approved recycler shall submit to CalRecycle a report on the net costs of recovery and/or recycling for the prior calendar year."

RECOMMENDATION:

PSDS needs to obtain an understanding on how to complete the Net Cost Report correctly.

FINDING 6: Source Verification Not Established

CONDITION:

In the review of the Collection Logs the auditor determined Palm Springs Disposal Services (PSDS) is not verifying if the E-Waste PSDS collects is from a California source. Palm Springs Disposal Services appears not to be in compliance with the Electronic Waste Recovery Regulation 18660.20 (c) (1) (2) (3) (4) (5), 18660.20 (d), and 18660.20 (h) (2).

CRITERIA:

Title 14 CCR Section 18660.20 (c) (1) (2) (3) (4) (5) states, "An approved collector shall make reasonable efforts to determine if CEWs it collects are from California Sources or from non-California sources and shall keep track of those materials separately.

Reasonable efforts may include any of the following, but not limited to (1) Posting signs and asking Californian sources. (2) Conducting spot checks and/or surveys. (3) Checking for a valid California identification of a person, a California license plate on a vehicle, and/or a bill of lading showing a California origin. (4) Requiring additional documentation from California sources or collectors delivering large numbers of CEWs. (5) Instituting measures to prevent CEWs from being dripped-off anonymously or illegally disposed at the approved collector's facilities or operations."

Title 14 CCR Section 18660.20 (d) states, "An approved collector shall not request recovery payment for non-California CEWs.

Title 14 CCR Section 18660.20 (h) (2) states, "A copy(ies) of the applicable portions of the collection log specified in subsection (j) of this section that describe the collection activities that resulted in the transferred CEWs.

RECOMMENDATION:

PSDS needs to make a reasonable effort to determine if CEWs it collects are from a California source.

RESTRICTED USE

This report is intended for the information and use of CalRecycle and Eco International management. However, this report is a matter of public record and distribution is not limited.

RESPONSE TO AUDIT REPORT

Palm Springs Disposal Services

March 4, 2010

Ernesto Espinoza California Integrated Waste Management Board (Calrecycle) P.O. Box 4025 ms 19a Sacramento, Ca 95812-4025

RE: Response to Draft Audit Report CEWID 102846

Dear Mr. Espinoza:

Enclosed is Palm Springs Disposal Services Response to the Draft Audit Report CEWID 102846. A response to each finding and samples of corrections made are also included. Please let me know if you need anything else. Thank you

Chris Cunningham, Recycling Manager Palm Springs Disposal Services P.O. box 2711 Palm Springs, Ca 92028

Palm Springs Disposal Services

March 4, 2010

Emesto Espinoza California Integrated Waste Management Beard (Calrecycle) P.O. Box 4025 ms 19a Sacramento, Ca 95812-4025

RE: Response to Draft Audit Report CEWID 102846

Dear Nr. Espinoza:
Enclosed is Palm Springs Disposal Services Response to the Draft Audit
Report CEWID 102846. A response to each finding and samples of
corrections made are also included. Please let me know if you need anything
else. Thank you

Chris Cunningham, Recycling Manager Palm Springs Disposal Services P.O. box 2711 Palm Springs, Ca 92028 Response to finding #1: Missing Certified Weight Tickets

1. Palm Springs Disposal Services is working with a new e-waste recycler (Electronic Recyclers). We are now provided copies of the Certified Weight Tickets for our records on every load.

Response to finding #2: form 197 not completed upon transfer

1. Palm Springs Disposal Services is now completing form 197 (Electronic Waste Transfer Receipt) for very load transferred.

Response to finding #3: Form 198 Not Completed By Collector

1. Palm Springs Disposal Services has obtained the proper form 198 (Electronic Waste Collection Log) the form is filled out accordingly by PSDS.

Response to finding #4: Source-Anonymous CEW not Logged Separately 1. Palm Springs Disposal Services has the proper forms and now has a separate Collection Log for the Source-Anonymous CEW.

Response to finding #5: Inaccurate Net Cost Report

1. Palm Springs Disposal Services has obtained written instructions on how to properly complete the Annual Net Cost Report.

Response to finding #6: Source Verification Not Established

1. Palm Springs Disposal Services has taken this opportunity to post signs at Drop Off site reading, only open during business hours and Palm Springs Residents Only. Staff has been instructed to check License plates and occasionally asking persons if they are Palm Springs residents. Measures have been taken if CEW's are dropped off after hours, (see #4 Source-Anonymous).

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Response to finding #2: form 197 not completed upon transfer

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been instructed to check License piates and occasionally asking persons if they are Palm
Springs residents. Measures have been taken if CEW's are dropped off after hours.

(see #4: Source- Anonymous).



Electronic Recyclers

Weighed At: Electronic Recyclers International Inc. 2860 S East Ave Fresno, CA 93725

Phone: (559) 442-3960 Fax: (559) 442-3998

ablum@electronicrecyclers.com

Vendor 1/18/10

Palm Springs Disposal Service 4690 E Mesquite Ave Palm Springs, CA 92264 Customer Type: OC

CEW#: 102846

WEIGHTMASTER CERTIFICATE

THIS IS TO CERTIFY that the following described commodity was weighed, measured, or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the California Department of Food and Agriculture.

Received	Contact	Phone	Received by	DO N	
1/22/2010	Chris Cunningham	(760) 227 1261	received by	PO Num	Shipment
	T can cumingham	(760) 327-1351	Jaime Arreguin	[Blanket PO]	245988

Receiving Report

Date: 2/22/2010

Page I of I

Item	Invoice	Pollet/TI-:/ XI		4 2 2 2 2 4 1 3 2 3 2 3 2 3 2 3 3 3 3				245988
1	537496	Pallet/ Unit Nur	mber	Description	Pack	Qty / Weight	Common Tare	Total Weigh
2	537496	833356		CRT Material (CRT Electron	ERI-P-1	449 lb	41 lb	408 1
3		833578		E-waste (Electronic Device)		554 lb	63 lb	491 1
	537496	833629		CRT Material (CRT Electron	ERI-PC-3	. 697 ІЪ	206 lb	4911
4	537496	833632		CRT Material (CRT Electron	ERI-PC-3	467 lb	206 lb	261 11
5	537496	833636		CRT Material (CRT Electron	ERI-PC-3	344 lb	206 lb	
6	537496	833638		CRT Material (CRT Electron	ERI-PC-3	862 lb	206 lb	138 11
7	537496	833646		CRT Material (CRT Electron		705 lb	206 lb	656 11
8	537496	833648		CRT Material (CRT Electron		873 lb	206 lb	499 11
9	537496	833650		E-waste (Electronic Device)		848 lb	63 lb	667 11
10	537496	833652		CRT Material (CRT Electron	-	687 lb	206 lb	785 15
11	537496	833659		CRT Material (CRT Electroi		728 lb		481 11
12	537496	833662		CRT Material (CRT Electron		343 lb	206 lb	522 lb
13	537496	833663		E-waste (Electronic Device)		752 lb	206 lb	137 lb
14	537496	833667	Blitte Hilli immt immt 2	CRT Material (CRT Electron			63 lb	689 lb
15	537496	833677	Mitt tuntt tunt tent	LCD Monitor/Laptop Non-S		282 lb	206 lb	76 lb
		C DOWN COUNTY OF THE COUNTY OF	ADD 1880 1881 (88)			137 lb	41 lb	96 lb
			L	CEWS	ub Totals	6,437 lb	2,101 lb	4,336 lb
			L	S	ub Totals	8,728 lb	2,331 lb	6,397 lb

Deputy:	Jaime Arreguin	9
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Electronic Recyclers

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COVERED ELECTRONIC WASTE TRANSFER RECEIPT

Please provide the following information to document transfer of Covered Electronic Wastes (CEWs) between Approved Collectors and Approved Recyclers. This required information must accompany all Covered Electronic Waste Recycling Payment Claims (CIWMB Form 196). Print legibly in ink or type.

Date Of Transfer:	Name Of Approved Collector:	CEW ID#	Nam	e Of Approved Recycl		
1/18/10	PALM SPRINGS DISPOSAL SERVICES	102846		CTRONIC RECYCLE		CEW ID#
Check Here If C	Operating As A Dual Entity During T	This Transaction.	L			
				Number Of Units Transferred	Cer	rtified Weight
CA Sourced CEWs		9 25		80		4,432
CA Sourced Non-CR	RT Containing CEWs					
	WV000000000000000000000000000000000000	TOTALS		80		4,432
	what amounts of the totals above a	re source anonyr	nous	Number Of Units Transferred		
Source Anonymous (CEWs					
Source Anonymous ?	Non-CRT Containing CEWs					
Check all that apply:		TOTALS				
Collector must provid	Il Designation Letters that are received and a description of any activity that excorded in the collection log.					
California Source Dec If operating as a dual	claration And Weight Verification I entity during this transaction, sign be	oth statements belo	ЭW.			
"I have verified that solely from Californ Signature of Approv	all CEWs transferred to the Appria sources."	oved Recycler fo	or whi	Printed Name	gha	quested are
Signature of Approve	ed Recycler		F	Printed Name	VV	

COVERED ELECTRONIC WASTE TRANSFER RECEIPT

in the approved collector listed above for ollector listed above for this transaction.			

CIWMB 198 (Revised 08/05) State of California

COVERED ELECTRONIC WASTE (CEW) COLLECTION LOG

Management Board

California Integrated Waste

Location of Collection Event (if different from the Collector's address); Telephone #: 760-327-1351 Other Electronics Un × Material Received Un Other CEWs W۱ 19 27 34 Units CEW ID #: Primary Contact Name: CRTs Chris Cunningahm Ongoing free public drop-off 1,485 1,045 Weight 1,950 ²Describe Sources of CEWs if Received Free Public Drop off: no collections of Free Public Drop off: no collections of Free Public Drop off: no collections of 5 or more units from any resident or 5 or more units from any resident or 5 or more units from any resident or TOTAL: 102846 from Other Collectors other organization. other organization. other organization. Material Received From 1 Consumer Handler / Approved Collector Address (street, city, & zip code); Type of Consumer α α α Handler / Approved Collector (Organization) Name: City of Palms Springs, CA, 3200 City of Palms Springs, CA, 3200 E. Tahquitz Canyon Way, Palm E. Tahquitz Canyon Way, Palm Springs, CA 92262 City of Palms Springs, CA, 3200 E. Tahquitz Canyon Way, Palm Springs, CA 92262 4690 E. Mesquite Ave., Palm Springs, CA 92264 Name and Address of Source of Springs, CA 92262 (Shipment 245988) Palm Springs Disposal Services Material: 12/21/09 -12/28/09 -12/26/09 1/2/10 1/4/10 -1/9/10

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Form 220A: Collectors and Collectors	and Recyclers for CEW	recovery activition)
CEW ID Number	PAI	LM SPRIGS DISPOSAL SERVICES
Reporting Period		102846
Date Prepared		2009
Important: Review the Guide to Net Cost Reporting prior to	Completing and attach this to	2/11/2010
REVENUE FROM CEV	W RECOVERY ACTIV	ITIES
		B. Identify Records and Methods Used*
Revenue from Recovery Saving Revenue from Revenue from Recovery Saving Revenue from Re	0.16) \$0.00	and the second s
descharged)	\$5,988.88	
3 Other Allowable Revenues (please specify)	\$	
4 Total Revenue from Recovery Activities	\$5,988.88	
COSTS OF CEME		(Enter on Form 220, Line 13A)
If reported costs are derived from a calculated allocation, described Costs	cibe method in column B. Us	e line 25 for additional line
5 Direct Labor	A. Costs	B. Calculation Method*
2. Oct Edgo!	\$0.00	
Transporting CEW to Collection F	e, & repair)	
Device Collection Facility	\$ _	
Transporting CEW from Collection Facility to Recyc	eler \$0.00	transportaton taken out of payment
ner Costs (exclude any transportation costs)		transportation taken out of payment
Advertising, Marketing, and Public Education	\$750.00	
Supplies Used in Recovery Activities	\$0.00	
Payments Made in Exchange for CEW		
Fees Charged by Recyclers	\$0.00	
Overhead	\$0.00	
Depreciation		
Insurance (non-transportation)	\$0.00	
Debt Service	\$0.00	
- Control	\$0.00	
Maintenance	\$0.00	
Fuel (non-transportation)	\$0.00	
Property Taxes	\$0.00	
Utilities		
Facilities and Equipment Rent or Lease	\$0.00	
Security	\$0.00	
The process of the same of the	\$0.00	
Indirect Labor	\$0.00	
Other Overhead (related to CEW recovery)	\$825.00	
Additional Costs (please specify)	\$0.00	
Total Cost of CEW Recovery Activities	61 575 00	
	\$1,575.00	(Enfer on Form 220, Line 14A)
Use this space to provide details on cost calculation methols: is an estimated cost to provide information through gene 22:is based on 2 hours per month of administrative handling.	adologios Assest	

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	Form 220: A Important: Review the Guide to Net Cost Report	Innual CE	W Net Cost Repo	rt /Forms 2200 and 220E)			
		Participant In		(1 Offits 220A and 220B).			
1	Organization Name		PALM SPRINGS DISPOSAL	SERVICES			
2	CEW ID Number						
3			102846				
		Type of Entity (Collector or Collector/Recycler)		COLLECTOR			
4			O. BOX 2711 PALM SPRINGS, CA. 92264				
5	The state of the s		90 E. MESQUITE AVE. PALM SPRINGS, CA.				
6	Contact Person for Net Cost Report		CHRIS CUNNINGHAM				
7	Title		RECYCLING MANAGER				
8	Phone Number for Contact Person		760-327-1351				
9	Email Address for Contact Person		chris@palmspringsdisposal.com				
10	Date of Report Preparation		11-Feb-10				
11	Reporting Period	Sec. 1. Sec. of the second section of the section of the second section of the section of the second section of the section o	2009				
		Net Cost Su					
	Use the information from the Net Cost Wo	orksheets (Forms 22	20A and 220B) to complete this Su	mmary Information			
	TE Days		From 220A: Recovery of CEW	From 220B: Recycling of CEW			
12	Enter an 'X' if you did not handle CEW in the year that was subject to the CEW Payment						
12	to line 18. You will not need to submit a 220						
On Line 13, exclude Standard Statewide CEW Recovery and CEW Recycling payments.							
	Total Revenues for CEW Recovery and/or	Recycling					
13	From Line 4 on Form 220A (recovery) and	Line 5 on Form	\$5,988.88				
220B (recycling). On Line 14. Recyclers must exclude Standard Statewide CEM Passyory payments made to Approved Callectors.							
	On Line 14, Recyclers must exclude Standard Statewide CEW Recovery payments made to Approved Collectors. Total Costs for CEW Recovery or Recycling						
14	From Line 24 on Form 220A (recovery) and	Line 26 on	\$1,575.00				
	Form 220B (recycling).						
15	Net Costs: Subtract Line 14 (Total Costs) from (Total Revenues). If total costs exceed total		24.442.00				
15	this will be a negative number.	rreveriues,	\$4,413.88				
Total Pounds of CEW Recovered (Column A) and							
16	Recycled (Column B-Recyclers Only)		117,766				
Include only Covered Electronic Waste							
17	Net Cost per Pound: Divide Line 15 (Net Cost) by Line 16 Total Pounds). If total costs exceed total revenues, this \$0.04 will be a negative number.						
17			\$0.04	The state of the s			
		Signed Decla					
	Must be signed by a person with Signature A						
	I hereby declare under penalty of perjury			- 1			
18	Printed Name and accompanying documents has been examined by me and is true, correct and complete. CHRIS CUNNINGHAM						
			DEN				
20	Signature () Signature						
21	Date Signed		11-Feb-10				
22	City and State Signed		PALM SPRINGS, C	Α.			

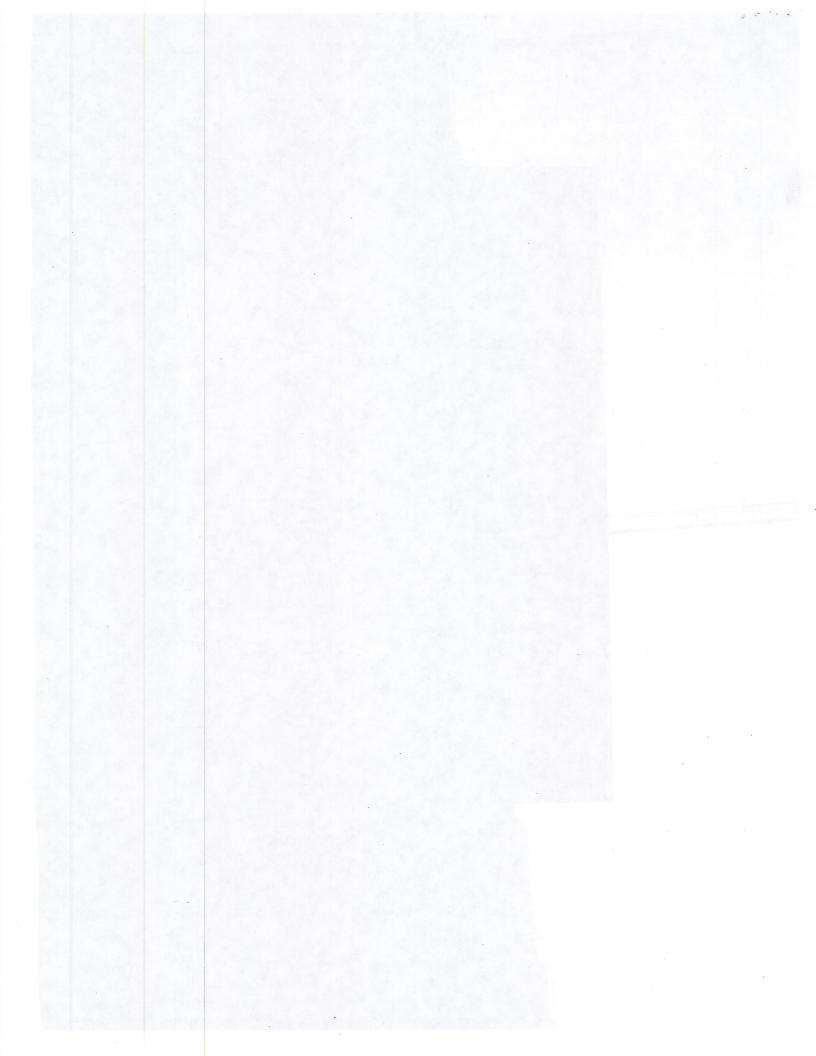
	6 Control Person for Net Cost Report
From 2.004. Recovery or CEW. Recycling of CEW. Recycling of CEW. Recycling payments.	

Palm Springs Residents One

DROP OFF HOURS

Mion - Fri 8:00am - 12:00pm 8:00am - 5:00pm

Olosed Sunday

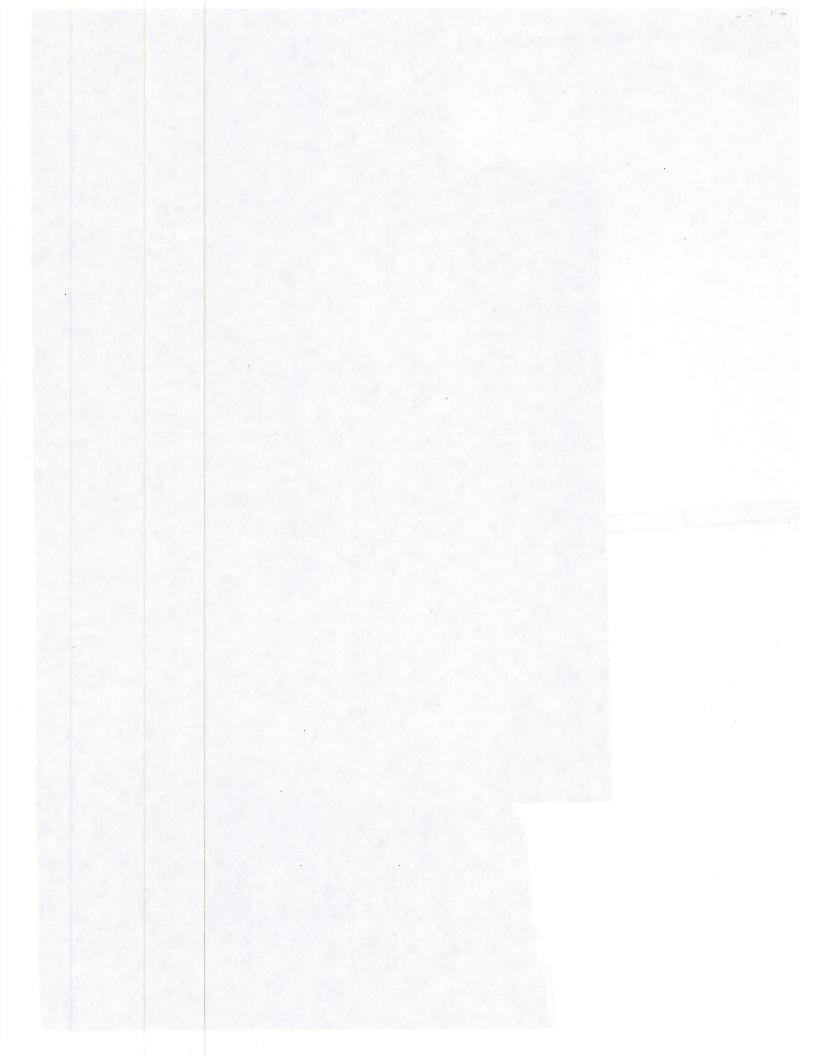


Palm Springs Residents Only

DROP OFF HOURS

Saturday Mon - Fri 8:00am - 12:00pm 8:00am - 5:00pm

Closed Sunday



EVALUATION OF RESPONSE TO AUDIT REPORT

During the course of the audit the following findings were noted:

FINDING 1: Missing Certified Weight Tickets

Palm Springs Disposal Services (PSDS) does not maintain copies of the Certified Weight Tickets.

PSDS' response stated, "PSDS is working with a new e-waste recycler (Electronic Recyclers). We are now provided copies of the Certified Weight Tickets for our records on every load."

Auditor's Reply

Finding 1 has been corrected based on the response above.

FINDING 2: Cal Recycle Form 197 Not Completed Upon Transfer

PSDS does not complete Cal Recycle Form 197 (Covered Electronic Waste Transfer Receipt) upon a CEW load transfer to the recycler.

PSDS' response stated, "Palm Springs Disposal Services is now competing form 197 (Electronic Waste Transfer Receipt) for every load transferred."

Auditor's Reply

Finding 2 has been corrected based on the response above.

FINDING 3: CalRecycle Form 198 Not Completed By Collector

PSDA did not complete CalRecycle Form 198 (Covered Electronic Waste Collection Log).

PSDS' response stated, "Palm Springs Disposal Services has obtained the proper form 198 (Electronic Waste Collection Log) the form is filled out accordingly by PSDS."

Auditor's Reply

Finding 3 has been corrected based on the response above.

FINDING 4: Source-Anonymous CEW Not Logged Separately

PSDS lists source- anonymous CEW on CalRecycle Form 198 (Covered Electronic Waste Collection Log) rather than CalRecycle Form 198 SA (Source Anonymous Collection Log).

PSDS' response stated, "Palm Springs Disposal Services has the proper forms and now has a separate Collection Log for the Source-Anonymous CEW."

Auditor's Reply

Finding 4 has been corrected based on the response above.

FINDING 5: Inaccurate Net Cost Report

The 2008 Net Cost Report was not completed correctly by PSDS, and was considered inaccurate.

PSDS' response stated, "Palm Springs Disposal Services has obtained written instructions on how to properly complete the Annual Net Cost Report."

Auditor's Reply

Finding 5 has been corrected based on the response above.

FINDING 6: Source Verification Not Established

PSDS does not verify if the E-Waste collected is from a California source.

PSDS' response stated, "Palm Springs Disposal Services has taken this opportunity to post signs at Drop Off site reading, only open during business hours and Palm Springs Resident Only. Staff has been instructed to check license plates and occasionally asking persons if they are Palm Springs residents. Measures have been taken if CEW's are dropped off after hours."

Auditor's Reply

Finding 6 has been corrected based on the response above.